

6.0 ALTERNATIVES

As required by Section 15126(d) of the State CEQA Guidelines, this EIR examines a range of reasonable alternatives to the proposed Grading and Stormwater Management Ordinances project that could feasibly achieve similar objectives. The discussion focuses on alternatives that may be able to reduce some of the adverse impacts associated with the proposed ordinances. Included in this analysis are the CEQA-required “no project” alternative, three alternatives that have varied agricultural exemption allowances, and one alternative that does not implement SL 1.3.2 (Variance required for development on slopes of 30% or greater) of the draft Conservation and Open Space Element. These are summarized below, and subsequently discussed in greater detail within the impact analysis for each alternative:

- **Alternative 1: No Project Alternative.** This alternative assumes that the proposed Grading and Stormwater Management Ordinances are not implemented, and that the County would be developed in accordance with existing zoning and General Plan designations.
- **Alternative 2: Additional Agricultural Exemptions.** This alternative would implement all the required changes associated with the General Construction Permit and Attachment 4 of the General Permit for Municipal Separate Storm Sewer Systems (MS4). This alternative examines the effect of including more agriculturally exempt activities within the inland and Coastal Zone portions of the County.
- **Alternative 3: More restrictive Agricultural Exemptions.** This alternative would implement all the required changes associated with the General Construction Permit and Attachment 4 of the General Permit for Municipal Separate Storm Sewer Systems (MS4). This alternative examines the effects of the proposed project with less agriculturally exempt activities.
- **Alternative 4: Not modifying Agricultural Exemptions in the Coastal Zone or adding the Alternative Review Program to the Coastal Zone.** This alternative would implement all the required changes associated with the General Construction Permit and Attachment 4 of the General Permit for Municipal Separate Storm Sewer Systems (MS4). Additionally, this alternative assumes the County would not include the proposed Agricultural Exemptions and Alternative Review Program within the Coastal Zone.
- **Alternative 5: Excluding 30% slope limitation in the inland ordinance.** This alternative would implement all the required changes associated with the General Construction Permit and Attachment 4 of the General Permit for Municipal Separate Storm Sewer Systems (MS4). Additionally, this alternative assumes that the County would not include the 30% slope limitation proposed in the draft Conservation and Open Space Element (SL 1.3.2).

The California Supreme Court, in *Citizens of Goleta Valley v. Board of Supervisors* (1990), indicated that a discussion of alternative sites is needed if the project “may be feasibly accomplished in a



successful manner considering the economic, environmental, social, and technological factors involved” at another site.

As suggested in *Goleta*, several criteria form the basis of whether alternative sites need to be considered in detail. These criteria take the form of the following questions:

1. *Could the size and other characteristics of another site physically accommodate the project?*
2. *Is another site reasonably available for acquisition?*
3. *Is the timing of carrying out development on an alternative site reasonable for the applicant?*
4. *Is the project economically feasible on another site?*
5. *What are the land use designation(s) of alternative sites?*
6. *Does the lead agency have jurisdiction over alternative sites? and*
7. *Are there any social, technological, or other factors which may make the consideration of alternative sites infeasible?*

The proposed Grading and Stormwater Management Ordinances would be applied on a countywide basis. As such, the project areas are distributed throughout San Luis Obispo County. Therefore, an alternative project site is not evaluated in this EIR because there are no other available sites that could reasonably accomplish the proposed project’s objectives.

Each alternative is described in detail in the following discussion. For reference, Table 6-1 compares the development characteristics of the five alternatives considered in this evaluation to the project described in Section 2.0 of this document.

Table 6-1. Comparison of Project Alternatives						
Activities to be Implemented	Proposed Project	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5
MS4 Requirements	●		●	●	●	●
General Construction Permit Req.	●		●	●	●	●
Slope Prohibition	●		●	●	●	
Coastal Zone Ag. Exemptions	●		●	●		●
Coastal Zone Alt. Review	●		●	●		●
Enforcement Modifications	●		●	●	●	●
Current Exempt Activities		●				
Increased Exempt Activities			●			
Restricted Exempt Activities	●			●	●	●
● <i>Included as part of the Proposed Project or Alternative Project</i>						

Table 6-1 describes how the proposed Grading and Stormwater Management Ordinances and alternatives to the proposed ordinances would effect development within the County by implementing one or a combination of the proposed alternatives.



6.1 ALTERNATIVE 1: NO PROJECT

6.1.1 Description

This alternative assumes that the proposed Grading and Stormwater Management Ordinances are not implemented, and that development throughout the County would occur in accordance with the existing grading ordinance and development procedures. The intent of the proposed project is to implement the requirements of the State Water Resources Control Board (SWRCB) related to the General Permit for Municipal Separate Storm Sewer Systems (MS4) and the General Construction Permit requirements. Development under the “No Project” alternative would not be subject to the requirements intended to reduce pollutants in stormwater discharges from construction sites and specific uses subject to the MS4 requirements. This would result in a violation of the County’s Stormwater Management Program and fines levied against the County for non-compliance with said program.

6.1.2 Impact Analysis

As discussed above, this alternative would not implement the mandates from the State Water Resource Control Board (SWRCB) related to construction site runoff and the MS4 requirements for specific uses. Since the intent of the proposed ordinances are to reduce pollutants in construction related stormwater runoff and uses of land that may result in stormwater pollution, negative impacts associated with water resources could result from not implementing the proposed project. Since development would continue under the current regulations, construction related impacts could occur that may result in greater areas of disturbance and greater impervious areas resulting in hydrology and water quality impacts to receiving waters.

Under this alternative, the amount of land to be developed is equal to the existing ordinance requirements because no changes would occur from the current regulations. No additional requirements would be placed on proposed projects (such as treatment control measures for specific uses) therefore development would continue as implemented under the current standards.

Impacts to agricultural resources are varied with the “No Project” alternative. This alternative would not introduce the proposed Agricultural Exemptions and Alternative Review Program to the Coastal Zone. The “No Project” alternative would also keep the existing “Agricultural Levels” in the inland ordinance which have historically been problematic in determining actual exempt status for specific agricultural activities. This would mean that agriculturalist within the Coastal Zone would still need to receive a County issued grading permit for various activities including but not limited to ponds, hillside benching, and creation of new fields. Since this alternative would not include the slope limitation associated with the proposed project (Class I impact), this alternative would likely result in a Class II impact because where a project would result in the need for an environmental determination, mitigation measures would be applied to minimize or eliminate resulting impacts.

Impacts to visual resources are anticipated to be greater for the inland portion of the County with the “No Project” alternative because this alternative does not include the proposed slope limitation from the Draft Conservation and Open Space Element (SL 1.3.2) that is included as



part of the proposed project. As proposed, an applicant would be required to apply for and receive a variance to develop on slopes of 30% or greater. This would consequently reduce the number of grading activities that occur on steeper slopes where large cut and fills slopes are created and visible from public areas.

Hydrology and water quality impacts would be greater than those anticipated under the proposed Grading and Stormwater Management Ordinances. Water related impacts associated with the proposed project have been determined to be a Class I impacts due to the unforeseen water usage associated with increased agricultural production in coastal areas where water availability is a concern. This alternative would reduce the identified Class I impact to a Class III. The intent of the proposed changes associated with the stormwater requirements are to reduce pollutants in runoff from construction sites and other uses, therefore not implementing the stormwater measures would result in negative impacts to hydrology and water quality.

Overall, impacts would be both greater and lesser for this alternative.

6.2 ALTERNATIVE 2: ADDITIONAL AGRICULTURAL EXEMPTIONS

6.2.1 Description

This alternative would include the proposed Grading and Stormwater Management Ordinances and additional agricultural exempt activities determined identified through discussions with the Agricultural Liaison Advisory Board (ALAB). The difference between Alternative 2 and the proposed project is the addition of additional appropriate agricultural exemptions recommended through consultation with ALAB.

Table 6-1 summarizes the difference in characteristics between the proposed project and this alternative. As described therein, Alternative 2 would provide additional agricultural exempt activities that are proposed under this EIR to be authorized under the Alternative Review Program as follows:

1. Crop production on slopes between 20% and 30%;
2. Hillside benches;
3. Trail and Recreation Enhancements; and
4. Small reservoir not to exceed 3 acre feet in size with same limitation as 22.52.080.B.4.

6.2.2 Impact Analysis

Agricultural Resources. This alternative would likely result in Countywide development potential similar to what is expected under the proposed project. The proposed project may change the area where non-agricultural development would occur on an agricultural parcel due to the slope limitations associated with the Draft Conservation and Open Space Policy (SL 1.3.2). Minimizing development on 30% slopes will serve to reduce erosion and sedimentation, as these sites are often the most at risk for sediment discharge and are the most difficult to employ long term erosion control measures, such as revegetation.



As a consequence of requiring Variance approval to develop on slopes greater than 30%, non-agricultural development will be more likely to occur on more productive and level terrain. Variance approval can only be granted where the applicant can demonstrate that there is a unique circumstance affecting the property, such as unique topographic condition or sensitive vegetation, and that they are not being granted a special privilege beyond what other adjacent property owners enjoy. Therefore, if a variance were granted, impacts could result from implementation of this policy.

Section 22.52.060 provides an exemption from the Variance requirement for certain agricultural uses and activities. The intent of the exemption is to allow for continuance and expansion of specific agricultural activities into appropriate areas of a subject site, while not burdening the agriculturalist with additional requirements typically associated with non-agricultural development. Providing more agricultural exemptions could result in increased agricultural production and beneficial impacts to agricultural resources. Thus, the magnitude of potential agricultural conversion impacts would likely be both beneficial and potentially significant.

Overall, impacts would be both greater and lesser for this alternative.

Air Quality. This alternative would result in increased agricultural exempt grading activities that are not subject to review by the Air Pollution Control District (APCD). At the same time, overall development potential Countywide through 2025 is likely to be similar to what is expected under the proposed project.

As discussed in Section 4.2, *Air Quality*, the proposed project is mostly consistent with the 2001 Clean Air Plan (CAP). Certain measures such as the Transportation Control Measures (TCM) are not appropriate to implement under these ordinances because these ordinance are not related to densities or changes in land uses. This alternative would result in additional agricultural exempt activities when compared to the proposed project thereby creating the potential for additional activities that would not be subject to air quality standards under the proposed ordinances. This alternative would be similarly consistent with the CAP consistency criteria.

Overall, air quality impacts would be slightly greater than expected under the proposed project.

Biological Resources. This alternative would likely result in Countywide development potential similar to what is expected under the proposed project but would increase the amount of agriculturally exempt activities. This alternative would allow additional projects to be processed through agricultural exemptions (see Section 6.2.1 above). The agriculturalists conducting the exempt grading would still be responsible to ensure that all permitting requirements have been met from other local, state, and federal agencies (as noted on the proposed Agriculture Grading Form and Alternative Review Form). Additionally, the agriculturalist would be required to employ the use of effective erosion and sedimentation control measures to reduce impacts to biological resources resulting from sedimentation and erosion impacts. Grading activities that would be authorized under both the "Alternative Review Program" would be subject to the requirements that are contained in the "San Luis Obispo County Partners in Restoration Permit Coordination Program, Mitigated Negative Declaration" and will be reviewed for potential impacts to biological resources as a requirement of the individual project.



Overall, the magnitude of potential biological impacts associated with this alternative would be similar to those expected under the proposed project.

Cultural Resources. This alternative would likely result in Countywide development potential similar to what is expected under the proposed project. This alternative would allow additional projects to be processed through agricultural exemptions (see Section 6.2.1 above). The agriculturalists conducting the exempt grading would still be responsible to ensure that all permitting requirements have been met from other local, state, and federal agencies. Grading activities that would be authorized under the “Alternative Review Program” are subject to the requirements that are contained in the “San Luis Obispo County Partners in Restoration Permit Coordination Program, Mitigated Negative Declaration” and will be reviewed for potential impacts to cultural resources as a requirement of the individual project. Although measures are in place to address potential impacts to cultural resources through the Alternative Review Process and agricultural exemptions, there is still a potential for unknown resources to be discovered ground disturbing activities. Thus, the magnitude of potential impacts to cultural resources would likely be greater as compared to the proposed project, since more unrestricted agricultural development could occur as a result of this alternative.

Overall, cultural resource impacts would be slightly greater than expected under the proposed project.

Hydrology and Water Quality. This alternative would likely result in Countywide development potential similar to what is expected under the proposed project. Potential impacts related to erosion, sedimentation, and pollutant discharges from agricultural activities could result from this alternative because County inspections and oversight are not required for agriculturally exempt or alternative review projects. Inspection and oversight are provided by applicable NRCS or RCD staff for projects meeting the “Alternative Review Program” criteria. Oversight that would be provided from the NRCS or RCD offices for agricultural activities under their jurisdiction would lessen potential hydrology and water quality impacts.

Overall, hydrology and water quality impacts would be greater than expected under the proposed project.

Geologic Hazards. This alternative would likely result in similar development patterns when compared to the proposed project. Additionally, this alternative would likely increase agricultural activities not conducted under the supervision of the County. Agricultural activities could be located in areas subject to landslide or liquefaction but exempt agricultural structures are not allowed under current ordinance regulations.

Overall, impacts from geologic hazards would be similar to those expected under the proposed project.

Noise. This alternative would likely result in similar development patterns when compared to the proposed project. As a result, grading and construction related noise impacts would be similar to the proposed project with the exception of agricultural operations that are exempt from the noise ordinance requirements (County Right to Farm Ordinance). This



alternative would not place additional sensitive receptors in areas exposed to nuisance noise levels, including near state highways, major county roadways or city streets, railroad operations, public or private airport operations, military activities and/or industrial facilities than already allowed under the General Plan or the proposed project. Thus, impacts under this alternative would likely be equal to the proposed project.

Overall, impacts from noise impacts would be similar to those expected under the proposed project.

Public Services. This alternative would result in similar development patterns when compared to the proposed project. As a result, impacts related to wastewater, solid waste, fire protection, police protection, emergency services, schools, and parks and recreation would be similar to the proposed project. Agricultural operations do not typically affect public services and are not required to pay impacts fees associated with public services.

Overall, impacts to public services and utilities would likely be similar to those expected under the proposed project.

Transportation and Circulation. As discussed in Section 4.9, *Transportation and Circulation*, it is not anticipated that this alternative will generate additional traffic beyond what is anticipated with the proposed project. If the agricultural activities are exempt or processed under the "Alternative Review Program," all material must be placed on the same or contiguous parcels therefore eliminating any increase in truck trips resulting from this alternative. If material is to be removed from the same or contiguous site, then a County issued grading permit would be required for placement of fill on a parcel requiring truck trips.

Overall, impacts associated with transportation and circulation would be equal to those expected under the proposed project.

Water Resources. This alternative would result in similar development patterns when compared to the proposed project. As a result, impacts related to water resource demand would be equal or slightly greater Countywide for this alternative. Overall water consumption in the inland portions of the County would likely be similar, though more agricultural development in rural areas would likely require more private wells drawing from groundwater sources. Increased agricultural production in the Coastal Zone may result in increased demand leading to water supply concerns in rural portions of the Coastal Zone. Because such wells would not be controlled by community services districts, it may be more difficult to track long term impacts on water resources under this alternative.

Overall, impacts associated with water resources would be similar or slightly greater to those expected under the proposed project.

Visual Resources. This alternative would result in similar development patterns when compared to the proposed project. Certain agricultural activities are exempted from the slope limitation proposal (SL 1.3.2 – Draft Conservation and Open Space Element) therefore visual impacts may result from this alternative. Cut and fill slopes associated with roads on steep



slopes leading to fields, crop production areas, and agricultural structures may be visible from public areas resulting in visual impacts.

Overall, impacts associated with visual resources may be greater than those expected under the proposed project.

6.3 ALTERNATIVE 3: MORE RESTRICTIVE AGRICULTURAL EXEMPTIONS

6.3.1 Description

This alternative would include the proposed Grading and Stormwater Management Ordinances and would be more restrictive on agricultural exempt activities which may not be appropriate for agricultural exemptions.

Table 6-1 summarizes the difference in characteristics between the proposed project and this alternative. As described therein, Alternative 3 would further restrict agricultural exempt activities that are proposed under this EIR to only authorize the following:

1. Maximum width of agricultural roads to be 12 feet (including shoulders); and
2. Crop production on slopes up to 10% allowed under Agricultural Exempt grading.

6.3.2 Impact Analysis

Agricultural Resources. This alternative may result in Countywide agricultural development less than what is expected under the proposed project. This alternative would authorize less intensive agricultural exemption / alternative review options compared to the proposed project (reduction in road widths and slope limitation from creations of new fields). By allowing fewer exemptions for agriculturalist, impacts related to agricultural resources would be greater than the proposed project because more agricultural activities would require a County issued permit or to be processed through the "Alternative Review Program."

Overall, agricultural impacts would be greater than what is expected for the proposed project.

Air Quality. This alternative would result in a restriction of agricultural exempt grading activities and alternative review activities recommended under the proposed project. No new impacts associated with Air Quality will result from this alternative as compared to the proposed project. Overall development potential Countywide through 2025 is likely to be similar to what is expected under the proposed project.

This alternative would result in fewer agricultural exempt activities when compared to the proposed project (narrower road widths and a lesser slope allowance for exempt crop production) therefore less air quality impacts would result. This alternative would be similarly consistent with these CAP consistency criteria.

Overall, air quality impacts would be slightly less than expected under the proposed project.



Biological Resources. This alternative may result in Countywide agricultural development potential less than what is expected under the proposed project. This alternative would further restrict the types of projects that may be processed through agricultural exemptions (see Section 6.3.1 above). The agriculturalists conducting the exempt grading would still be responsible to ensure that all permitting requirements have been met from other local, state, and federal agencies (as noted on the proposed Agriculture Grading Form and Alternative Review Form). Additionally, the agriculturalist would be required to employ the use of effective erosion and sedimentation control measures to reduce impacts to biological resources resulting from sedimentation and erosion impacts. Grading activities that would be authorized under the "Alternative Review Program" are subject to the requirements that are contained in the "San Luis Obispo County Partners in Restoration Permit Coordination Program, Mitigated Negative Declaration" and will be reviewed for potential impacts to biological resources as a requirement of the individual project.

Overall, the magnitude of potential biological impacts associated with this alternative would be similar to those expected under the proposed project.

Cultural Resources. This alternative may result in Countywide agricultural development less than what is expected under the proposed project. This alternative would further restrict activities that may be processed through agricultural exemptions (see Section 6.3.1 above). The agriculturalists conducting the exempt grading would still be responsible to ensure that all permitting requirements have been met from other local, state, and federal agencies (as noted on the proposed Agriculture Grading Form and Alternative Review Form). Grading activities that would be authorized under the "Alternative Review Program" are subject to the requirements that are contained in the "San Luis Obispo County Partners in Restoration Permit Coordination Program, Mitigated Negative Declaration" and will be reviewed for potential impacts to cultural resources as a requirement of the individual project. Although measures are in place to address potential impacts to cultural resources through the "Alternative Review Program," there is still a potential for unknown resources to be discovered ground disturbing activities. The magnitude of potential impacts to cultural resources would likely be less than compared to the proposed project, since less intensive agricultural development could occur as a result of this alternative.

Overall, cultural resource impacts would be slightly less than expected under the proposed project.

Hydrology and Water Quality. This alternative may result in Countywide agricultural development less than what is expected under the proposed project. Potential impacts related to erosion, sedimentation, and pollutant discharges from agricultural activities could result from this alternative because County inspections and oversight are not required for agriculturally exempt or alternative review projects. Since this alternative would provide less agriculturally exempt activities, hydrology and water quality impacts resulting from this alternative would likely be less than the proposed project. Oversight is provided from the NRCS and RCD offices for alternative review projects under their supervision which would lessen potential hydrology and water quality impacts.



Overall, hydrology and water quality impacts would be slightly less than expected under the proposed project.

Geologic Hazards. This alternative may result in Countywide agricultural development less than what is expected under the proposed project. This alternative would lessen the exemptions afforded under the proposed project (e.g. narrower roads and flatter terrain for crop production) where exempt activities are authorized. This would then reduce the likelihood of geologic hazards associated with the proposed project because fewer activities would be authorized outside of the County permit process on terrain that may result in hazardous conditions (e.g. cut and fill slopes in geologically unstable areas).

Overall, impacts from geologic hazards would be slightly less than those expected under the proposed project.

Noise. This alternative may result in less intensive agricultural development when compared to the proposed project. As a result, grading and construction related noise impacts would be slightly less when compared to the proposed project. Agricultural operations that are exempt from the noise ordinance requirements (County Right to Farm Ordinance) would not be changed by this alternative. This alternative would not place additional sensitive receptors in areas exposed to nuisance noise levels, including near state highways, major county roadways or city streets, railroad operations, public or private airport operations, military activities and/or industrial facilities than already allowed under the General Plan or the proposed project. Thus, impacts under this alternative would likely be equal to or slightly less than the proposed project.

Overall, impacts from noise impacts would be similar or slightly less than those expected under the proposed project.

Public Services. This alternative may result in less intensive Countywide agricultural development when compared to the proposed project. Agricultural grading activities typically do not result in a need for additional public services. As a result, impacts related to wastewater, solid waste, fire protection, police protection, emergency services, schools, and parks and recreation would be similar to the proposed project.

Overall, impacts to public services and utilities would likely be similar to those expected under the proposed project.

Transportation and Circulation. This alternative may result in less intensive Countywide agricultural development when compared to the proposed project. Since exemptions are proposed to be reduced under this alternative, the impacts from this alternative would likely be less than under the proposed project. All agriculturally exempt activities require that the material generated from these activities be placed on the same or contiguous parcels therefore eliminating any increase in truck trips resulting from this alternative.

Overall, impacts associated with transportation and circulation would be similar to or less than those expected under the proposed project.



Water Resources. This alternative may result in less intensive agricultural development when compared to the proposed project. As a result, impacts related to water resource demand would be equal or slightly less for this alternative. Overall water consumption in the inland portions of the County would likely be similar, though more development in rural areas would likely require more private wells drawing from groundwater sources. Agricultural production in the Coastal Zone may result in an overall increased demand, leading to water supply concerns in rural portions of the Coastal Zone, but slightly less water demand than the proposed project due to the additional restrictions proposed under this alternative.

Overall, impacts associated with water resources would be similar or slightly less to those expected under the proposed project.

Visual Resources. This alternative may result in less intensive Countywide agricultural development when compared to the proposed project. Agricultural activities are not restricted by the slope limitation proposal (SL 1.3.2 – Draft Conservation and Open Space Element) therefore visual impacts could result from this alternative. This alternative would have less of an impact on visual resources than the proposed project because road widths would be reduced under this alternative resulting in smaller cut and fill slopes that may be visible from public areas.

Overall, impacts associated with visual resources would be similar or slightly less than those expected under the proposed project.

6.4 ALTERNATIVE 4: NOT MODIFYING EXISTING AGRICULTURAL EXEMPTIONS IN THE COASTAL ZONE OR ADDING THE ALTERNATIVE REVIEW PROGRAM TO THE COASTAL ZONE

6.4.1 Description

This alternative would include the proposed Grading and Stormwater Management Ordinances and would not modify agricultural exempt activities in the Coastal Zone or add the alternative review program to the Coastal Zone ordinance. Table 6-1 summarizes the difference in characteristics between the proposed project and this alternative.

6.4.2 Impact Analysis

Agricultural Resources. This alternative would likely result in agricultural development potential less than what is expected under the proposed project. This alternative would not authorize additional agricultural exemptions or the “Alternative Review Program” within the Coastal Zone ordinance. This would result in the same permit requirements that are currently required for agricultural development activities within the Coastal Zone. Since agriculturalist may be required to obtain construction and / or grading permits for specific agricultural activities. Overall impacts to agricultural resources would be greater than anticipated under the proposed project.



Air Quality. This alternative would not authorize the agricultural exempt grading activities and “Alternative Review Program” recommended under the proposed project. No new impacts associated with Air Quality will result from this alternative as compared to the proposed project. Overall development potential Countywide through 2025 is likely to be similar to what is expected under the proposed project.

This alternative would result in fewer agricultural exempt activities when compared to the proposed project (no changes within the Coastal Zone) therefore less air quality impacts would result.

Overall, air quality impacts would be slightly less than expected under the proposed project.

Biological Resources. This alternative would likely result in agricultural development potential less than what is expected under the proposed project. This alternative would not change the existing agricultural exemptions or add the “Alternative Review Program” within the Coastal Zone. The agriculturalist conducting work may be subject to County permits, depending on the specific activity, and would be required to submit applicable biological resource information based on the proposed grading activity to be reviewed as a part of the County issued permit process.

Overall, the magnitude of potential biological impacts associated with this alternative would be less than those expected under the proposed project.

Cultural Resources. This alternative would likely result in agricultural development potential less than what is expected under the proposed project. This alternative would not change agricultural exemptions or add the “Alternative Review Program” within the Coastal Zone where a high percentage of cultural sites are located. The agriculturalist conducting work would be subject to County permits and would be required to submit applicable cultural resource information based on the proposed grading activity to be reviewed as a part of the County issued permit application.

Overall, cultural resource impacts would be less than expected under the proposed project.

Hydrology and Water Quality. This alternative would likely result in agricultural development potential less than what is expected under the proposed project. Potential impacts related to erosion, sedimentation, and pollutant discharges from agricultural activities would likely be less under this alternative because the grading activities would be subject to inspections and oversight by a County inspector. Appropriate sedimentation and erosion control measures would be required as part of the County permit reducing potential impacts from said agricultural activity.

Overall, hydrology and water quality impacts would be less than expected under the proposed project.

Geologic Hazards. This alternative would result in less agricultural development potential when compared to the proposed project. This alternative would not change agricultural exemptions or add the “Alternative Review Program” within the Coastal Zone. This would then



reduce the likelihood of geologic hazards associated with this alternative because fewer activities would be authorized outside of the County permit process on terrain that may result in hazardous conditions (e.g. cut and fill slopes in geologically unstable areas).

Overall, impacts from geologic hazards would be slightly less than those expected under the proposed project.

Noise. This alternative would result in less agricultural development potential when compared to the proposed project. This alternative would not change agricultural exemptions or add the “Alternative Review Program” within the Coastal Zone. Noise related impacts resulting from this alternative would consequently be less than the proposed project because less agricultural related equipment would be operating near potential noise sensitive receptors.

Overall, impacts from noise impacts would be similar or slightly less than those expected under the proposed project.

Public Services. This alternative would result in less agricultural development potential when compared to the proposed project. Agricultural grading activities typically do not result in a need for additional public services, therefore, impacts related to wastewater, solid waste, fire protection, police protection, emergency services, schools, and parks and recreation would be similar to the proposed project.

Overall, impacts to public services and utilities would likely be similar to those expected under the proposed project.

Transportation and Circulation. This alternative would result in less agricultural development potential when compared to the proposed project. This alternative would not change the agricultural exemptions or add the “Alternative Review Program” within the Coastal Zone. Since these projects would be subject to County permits, any potential impacts related to traffic and circulation would be addressed through project specific mitigation measures.

Overall, impacts associated with transportation and circulation would be less than those expected under the proposed project.

Water Resources. This alternative would result in less agricultural development potential when compared to the proposed project within the Coastal Zone. As a result, impacts related to water resource demand would likely be less within the Coastal Zone for this alternative but similar to the proposed project in the inland portions of the County. Water related impacts associated with the proposed project have been determined to be a Class I impacts due to the unforeseen water usage associated with increased agricultural production in coastal areas where water availability is a concern. This alternative would reduce the identified Class I impact to a Class III.

Overall, impacts associated with water resources would be less than those expected under the proposed project.



Visual Resources. This alternative would result in less agricultural development potential when compared to the proposed project. This alternative would not change agricultural exemptions or add the “Alternative Review Program” within the Coastal Zone. Visual impacts would be similar as a result of this alternative for the inland portions of the County since no changes are proposed for the inland portion of the County with this alternative. Impacts associated with not changing the agricultural exemptions or adding the “Alternative Review Program” in the Coastal Zone would reduce potential visual impacts associated with this alternative (e.g. visible cut and fill slopes).

Overall, impacts associated with visual resources would be less than those expected under the proposed project.

6.5 ALTERNATIVE 5: EXCLUDING 30% SLOPE LIMITATION IN THE INLAND ORDINANCE

6.5.1 Description

This alternative would include the proposed Grading and Stormwater Management Ordinances and would not include the slope limitation within the inland portions of the County as identified in the Draft Conservation and Open Space Element (draft Conservation and Open Space SL 1.3.2 - variance requirement).

Table 6-1 summarizes the difference in characteristics between the proposed project and this alternative. As described therein, Alternative 5 would not include the slope limitation within the inland portions of the County as identified in the Draft Conservation and Open Space Element and as proposed under this EIR. The proposed slope limitation would require a property owner to obtain Variance approval prior to applying for a project on slopes greater than 30%. The Variance process allows the County to approve, deny, or conditionally approve a project based on the required findings for a Variance approval.

6.5.2 Impact Analysis

Agricultural Resources. This alternative would likely result in agricultural development potential that is similar to what is expected under the proposed project. This alternative would not restrict non-agricultural activities (e.g. residences and residential accessory uses) from being located on hillsides or ridgelines (see Visual Resources discussion below) but may limit the conversion of prime soils to non-agricultural uses. By removing the slope limitation associated with the proposed project (Class I impact), this alternative would likely result in a Class II impact because where a project would result in the need for an environmental determination, mitigation measures would be applied to minimize or eliminate resulting impacts. Impacts associated with this alternative would be similar for development in the Coastal Zone because the Coastal Zone already contains a slope limitation for development on slopes of 30% or greater which would not be affected by this alternative.

Overall impacts to agricultural resources would be less than expected from the proposed project.



Air Quality. This alternative would not restrict grading on slopes of 30% or greater for the inland portions of the County. No new impacts associated with Air Quality would result from this alternative as compared to the proposed project. Overall development potential Countywide through 2025 is likely to be similar to what is expected under the proposed project.

As discussed in Section 4.2, *Air Quality*, the proposed project is mostly consistent with the 2001 Clean Air Plan (CAP). Since this alternative does not result in additional air quality impacts, this alternative would be mostly consistent with the 2001 CAP as well. Certain measures such as the Transportation Control Measures (TCM) are not appropriate to implement under these ordinances because these ordinance are not related to densities or changes in land uses.

Overall, this alternative would result in similar air quality impacts than the proposed project.

Biological Resources. This alternative would not restrict grading on slopes of 30% or greater for the inland portions of the County. An applicant conducting work would be subject to County permits and would still be required to submit applicable biological resource information based on the proposed grading activities to be reviewed as a part of the County issued permit process. A variance would not be required to allow the proposed work to occur. As a result, impacts related to sensitive habitats, special status species, and wildlife movement corridors may be greater than the proposed project. The alternative would not be subject to a discretionary approval process (Variance), as proposed in the EIR, but would be subject to an environmental determination and mitigation measures as appropriate.

Overall, the magnitude of potential biological impacts associated with this alternative would be similar to those expected under the proposed project but would have the potential to be greater because staff cannot deny a non-discretionary activity.

Cultural Resources. This alternative would likely result in development potential similar to what is expected under the proposed project. This alternative would not require a variance for development on slopes of greater than 30% for the inland portions of the County. Development that could be authorized on ridgelines as a result of removing this slope limitation may result in greater impacts to cultural resources because ridgelines were often used as travel corridors for Native Americans and current development often seeks to obtain grand vistas where cultural sites often exist. Development requiring a County permit would be required to submit applicable cultural resource information based on the proposed grading activities to be reviewed as a part of the County issued permit application. The alternative would not be subject to a discretionary approval process (Variance), as proposed in the EIR, but would be subject to an environmental determination and mitigation measures as appropriate.

Overall, cultural resource impacts would be similar to what is expected under the proposed project but would have the potential to be greater because staff cannot deny a non-discretionary activity.

Hydrology and Water Quality. This alternative would likely result in development potential similar to what is expected under the proposed project. Potential impacts related to erosion, sedimentation, and pollutant discharges from development activities would likely be greater than what is expected under this alternative because the grading activities would be



more likely to occur on steep slopes without the proposed slope limitation. The project would still be subject to inspections and oversight by the County inspectors whether a variance is required for the activity or not. Grading activities that take place on steep slopes or in areas of erosive soils have a greater potential to result in hydrology and water quality impacts.

Overall, hydrology and water quality impacts would be slightly greater than expected under the proposed project.

Geologic Hazards. This alternative would likely result in development potential similar to what is expected under the proposed project. This alternative would not require a variance for development on slopes of greater than 30% for inland portions of the County. Development requiring a County permit would be required to submit applicable geologic hazards information based on the proposed grading activities which would be reviewed as a part of the County issued permit process. The alternative would not be subject to a discretionary approval process (Variance), as proposed in the EIR, but would be subject to an environmental determination and mitigation measures as appropriate. This alternative would then increase the likelihood of geologic hazards associated with development in hazardous areas because staff could not deny a project if the project is not subject to a discretionary approval process.

Overall, impacts from geologic hazards would be slightly greater than those expected under the proposed project.

Noise. This alternative would likely result in development potential similar to what is expected under the proposed project. This alternative would not require a variance for development on slopes of greater than 30% for inland portions of the County. As a result, grading and construction related noise impacts would be similar. In addition, it would similarly place sensitive receptors in areas exposed to nuisance noise levels, including near state highways, major county roadways or city streets, railroad operations, public or private airport operations, military activities and/or industrial facilities.

Overall, impacts from noise impacts would be similar to those expected under the proposed project.

Public Services. This alternative would likely result in development potential similar to what is expected under the proposed project. This alternative would not require a variance for development on slopes of greater than 30% for inland portions of the County. No new direct impacts related to wastewater, solid waste, fire protection, police protection and emergency services, schools, and parks and recreation would be anticipated.

Overall, impacts to public services and utilities would likely be similar to those expected under the proposed project.

Transportation and Circulation. This alternative would likely result in development potential similar to what is expected under the proposed project. This alternative would not require a variance for development on slopes of greater than 30% for inland portions of the County. Development that may result could require longer access driveways to provide safe access to a residence or other use. Access road improvements and other requirements to allow



fire and other safety vehicles to access steep building locations would be required to provide adequate emergency access to these areas.

Overall, impacts associated with transportation and circulation would be similar to those expected under the proposed project.

Water Resources. This alternative would result in similar development patterns when compared to the proposed project. This alternative would not require a variance for development on slopes of greater than 30% for inland portions of the County. Impacts related to water resource demand would likely be equal for this alternative. Overall water consumption in the inland portions of the County would likely be similar, though more development in rural areas would likely require more private wells drawing from groundwater sources. Because such wells would not be controlled by community services districts, it may be more difficult to track long term impacts on water resources under this alternative.

Overall, impacts associated with water resources would be similar to those expected under the proposed project.

Visual Resources. This alternative would result in similar development patterns when compared to the proposed project. This alternative would not require a variance for development on slopes of greater than 30% for inland portions of the County. Grading activities that occur on steep slopes have a greater potential to affect visual resources because cut and fill slope requirements increase as the natural grade increases resulting in larger cut and fill slopes potentially visible from public areas. The Coastal Zone currently contains a slope limitation therefore impacts within the Coastal Zone would be similar to the proposed ordinance.

Overall, impacts associated with visual resources would be greater than those expected under the proposed project for the inland portions of the County.

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This section evaluates the findings for the proposed project and the five alternatives under consideration. It also identifies the environmentally superior alternative for each issue area, as shown on Table 6-2. In accordance with the State CEQA Guidelines, if the No Project Alternative is identified as the Environmentally Superior Alternative, the alternative among the remaining scenarios that is environmentally superior must also be identified. In addition, Table 6-2 shows whether each alternative's environmental impact is better than, worse than, or similar to the proposed project.

The alternatives discussed herein have been evaluated for each issue area and compared to the proposed project with and equal, superior, or inferior scoring system. The choice of an environmentally superior alternative depends on how one weighs the different issue areas or resources being potentially impacted by one or more of the alternatives. Individual readers may come to a different conclusion on which alternative is the environmentally superior alternative based on their view of how an issue area should be weighed in relation to another issue area.



Table 6-2. Impact Comparison of Alternatives to Proposed Project

Issue	Proposed Grading and Stormwater Management Ordinances	Alt. 1 (No Project Alternative)	Alt. 2 (Additional Exemptions)	Alt. 3 (Restricted Exemptions)	Alt. 4 (No change to Coastal Zone Exemptions)	Alt. 5 (No Slope Limitation)
Agricultural Resources	=	+ / -	+ / -	-	-	+
Air Quality	=	-	-	+	+	=
Biological Resources	=	+ / -	=	=	+	+ / -
Cultural Resources	=	+ / -	-	+	+	+ / -
Hydrology and Water Quality	=	-	-	+	+	-
Geologic Hazards	=	+ / -	=	-	+	-
Noise	=	=	=	=	=	=
Public Services	=	=	=	=	=	=
Transportation and Circulation	=	-	=	=	+	=
Water Resources	=	+	-	=	+	=
Visual Resources	=	-	-	+	+	-
Overall	=	-	-	-	+	-

+ Environmentally Superior to the Proposed Project
 - Environmentally Inferior to the Proposed Project
 = Impacts Similar to Proposed Project

Alternative 4 (Proposed project not Modifying Existing Agricultural Exemptions in the Coastal Zone or Adding Alternative Review Program to the Coastal Zone) is considered the environmentally superior project overall, because it includes all the required changes associated with the National Pollutant Discharge Elimination System (NPDES). Additionally, the project has been determined to have fewer impacts to all the issue areas studied in the EIR through the alternatives analysis as described above.

Alternatives 1 does not meet the requirements of the National Pollutant Discharge Elimination System (NPDES) and would place the County in a position of being subject to fines from the Regional Water Quality Control Board (RWQCB) for not complying with our own adopted Stormwater Management Program. This alternative would not provide protection of local waterways as prescribed by State and Federal regulations.

Alternatives 2, 3, and 5 are environmentally inferior to the proposed project from the standpoint that they would result in less overall protection of resources as identified in the alternatives analysis. A greater array of environmental resources would be impacted or potentially impacted as a result of implementing either of these alternatives.

